

Transportation Enforcement Branch

Introduction to Strategic Options

Executive Summary

The Transportation Enforcement Branch (TEB) of the California Public Utilities Commission (CPUC) enforces provisions of state code to provide consumer protection and safety oversight of approximately 12,000 non-rail passenger carriers (limousines, airport shuttles, charter and scheduled bus operators, transportation network companies) and 1,000 household goods movers (moving companies).

In recent months, concern over CPUC's disparate set of regulatory responsibilities has led to more serious consideration of a proposal to move the transportation program to another agency. State agencies such as the Department of Motor Vehicles (DMV) or the California Highway Patrol (CHP) that focus on transportation may be better equipped to perform licensing and street-level enforcement functions. Such a move could enable CPUC to better focus on its climate and safety mandates while improving state regulation of carriers overall. However there are important tradeoffs to consider, including transaction costs associated with the transfer and the feasibility of passing legislation.

This brief begins to explore options for California's carrier regulation by identifying pros and cons associated with two proposed courses of action:

Option 1: Shift responsibility for regulation of passenger and household goods carriers to a transportation-focused agency.

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| Pros | <ul style="list-style-type: none">• CPUC could better focus on its energy and safety mandates• Agency focused on transportation and equipped for street-level enforcement could provide more effective and efficient carrier regulation• A new agency could more easily obtain needed resources |
| Cons | <ul style="list-style-type: none">• Would require legislation• No other agency clearly can or wants to take over program• A new agency would need to develop unfamiliar functions and expertise• Adjudicatory and licensing/investigatory functions would be performed by different entities• State would incur transaction costs associated with a transfer• Would take at minimum of five years to complete the transfer |

Option 2: Invest in regulation of passenger and household goods carriers at the CPUC.

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| Pros | <ul style="list-style-type: none">• State would avoid costs associated with transferring responsibilities• CPUC would continue to offer one-stop shop for licensing/investigative and adjudicatory functions• TEB has already undergone an audit and prepared a roadmap for improving the program; the problems are known and fixable |
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| <p>Cons</p> <ul style="list-style-type: none">• CPUC's ability to effectively prioritize between responsibilities would continue to be limited• TEB's chronic understaffing and position classification structure would need to be addressed (estimated 5-7 additional positions)• IT systems would need multi-million dollar upgrades• TEB would have to build analytical and operational capacities to tackle regulation of new or changing carrier models including TNCs and intra-city jitneys like Chariot |
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While this brief is organized around two main options, a spectrum of alternatives in between is available to the Commission, including the following:

- Keeping carrier regulation at the CPUC and improving high-level coordination between DMV, CHP and CPUC
- Allocating aspects of carrier regulation between DMV, CHP, local law enforcement, and state and local district attorneys and court systems
- Creation of an entirely new organization or department under the umbrella of the California State Transportation Agency

Underlying these tradeoffs are two central questions: what would effective state regulation of passenger and household goods carriers look like, and what agency or combination of agencies is best positioned to deliver? Answering these questions will require further analysis in several areas, including industry changes, efficiencies (if any) that could be found in other agencies, and other alternative solutions.

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1. Overview of the Transportation Program

Summary of Transportation Program Primary Work Activities

The Transportation Enforcement Branch (TEB) of the California Public Utilities Commission (CPUC or the Commission) enforces provisions of the Public Utilities (PU) Code, Vehicle Code, and Business and Professional Code, among others, to provide consumer protection and safety oversight to approximately 11,000 non-rail passenger carriers (limousines, airport shuttles, charter and scheduled bus operators, transportation network companies) and 1,000 household goods movers.

TEB serves multiple functions, some of which are unique to the CPUC.

First, TEB is the transportation industry expert for the Commission, and is structured to serve in both advisory and prosecutorial roles.

Second, TEB receives, on average, 400 pieces of mail each day from regulated carriers to apply for, to renew, to modify or to maintain permits to operate. The CPUC requires passenger stage carriers to file a formal application for a Commission vote. Such applications require a high level of analytical review from TEB staff, who, in 2014, wrote 15 decisions for public comment and a Commission vote. TEB also develops, proctors, and grades the exam that household goods carriers must pass in order to operate.

Third, in its enforcement role, TEB:

- Conducts inspections at airports and other venues. TEB dedicates two full-time inspectors at the Los Angeles International Airport. In 2014, TEB participated in a total of 11 inspections at the Oakland and San Francisco airports, and other venues across the state.
- Investigates suspected carrier misconduct, whether on staff's own motion, or those reported by consumers, the public, law enforcement agencies and other carriers. In 2014, TEB opened 277 new investigations and completed 279 investigations.
- Issued 65 informal citations, 315 cease-and-desist notices and 118 infraction notices in 2014.
- Prepares and prosecutes formal cases before the CPUC.
- Submitted eight criminal cases in 2014 to local prosecutors or the California Attorney General's Office with recommendations for criminal (felony or misdemeanor) or civil prosecution.
- Prepares resolutions which update General Orders in response to legislation and Commission decisions. Currently, TEB has four draft resolutions in the pipeline.

And finally, the introduction of Transportation Network Companies (TNCs) created a need for greater and ongoing analytical attention to study that emerging area and support formal policy proceedings.

TEB utilizes multiple tools and partners to enforce state laws and performs several major functions. Regulation of passenger and household goods carriers involves information sharing among multiple state agencies. For example, TEB prosecutes carriers cited by the California Highway Patrol (CHP) for violations of the PU Code, and provides carrier data to support the CHP bus and modified limousine inspection programs. The Commission also requires carriers to enroll drivers in the “pull-notice” program managed by the Department of Motor Vehicles (DMV). The DMV notifies carriers when a driver accumulates an excessive number of traffic violations and thus no longer meets Commission driver requirements.

The CPUC also works closely with local authorities, such as airports, police and sheriff departments, and city and district attorney’s offices on “stings,” citations, vehicle checkpoints and prosecuting violations.

Public Value Provided by the Commission’s Transportation Oversight

The Commission provides a one-stop-shop to the transportation industry, consumers, the public and law enforcement agencies through its in-house policy, permitting, citation, legal, prosecutorial, and adjudicatory expertise.

All transportation entities are primarily motivated by profits, which at times may conflict with adherence to statutes and Commission orders. As such, TEB’s workload is directly linked to the safety and consumer protection of people and the contents of their homes transported by these firms.

TEB also ensures that passenger and household goods carriers operate in conformance with statutory safety and consumer protection requirements and compete fairly in the marketplace. Here the goals are the protection of “things” and ensuring compliance with consumer protection rules. TEB grants operating authority to carriers that meet such requirements, denies or revokes authority to operate for carriers that fail to meet or maintain the requirements, and provides policy and technical support to decision-makers. TEB also investigates and prosecutes carriers who violate the law and resolves complaints from consumers, the public and competitive carriers that report dangerous, fraudulent or illegal activities.

TEB Challenges

In June 2014, the California Bureau of State Audits (BSA) issued an audit report critical of the Commission’s transportation enforcement program. The BSA concluded that the program:

- Lacked procedures in several key enforcement areas, including the complaint, citation and penalty assessment processes.
- Demonstrated inadequate and inconsistent fiscal management processes, such as failure to: 1) conduct financial audits; 2) track fees and penalty payments; 3) collect citation penalties; and 4) ensure that fees collected adequately cover costs required to regulate those carriers as required by state law.
- Redirected authorized positions to non-transportation workload in other areas of the agency.
- Lacked “effective program leadership and program goals or performance measures to guide its oversight efforts,” and noted the high turnover in SED and TEB—“14

different individuals filled seven key management positions over the last four years.”

In response, TEB undertook an effort to address issues raised by BSA and provided a status report at the end of 2014. BSA accepted the CPUC progress report and the final update from CPUC to BSA is due on June 15, 2015.

Recent Improvements

Under new management since July 2014, TEB implemented and made progress on the majority of the audit recommendations by December 31, 2014; all corrective actions will be complete by June 15, 2015. Corrective actions include:

- New complaint, enforcement, citation and fiscal procedures.
- A formal training plan.¹
- TEB management vacancies filled by July 2014.
- Strategic Plan.
- Annual Plan.
- Staff Allocation Plan.
- IT upgrades.
- MOU with Franchise Tax Board to share carrier tax data.

Inadequate IT systems have been well documented to be a major challenge for TEB. To address that issue, the CPUC developed electronic insurance filing in 2014 and expects to complete electronic application submission and fee payment processes as part of an agency-wide IT overhaul in late 2017, pending approval by the California Department of Technology. However, even with these improvements the transportation program continues to face challenges, including an increased workload, personnel classification structure, an imbalance between state-authorized spending and monies collected from carriers, and inadequate IT systems.

To raise performance to an acceptable level and better coordinate with other state and local agencies, TEB will require significant additional investment as well as support from executive leadership moving forward. Most critically, new and integrated IT systems could be tailored to accommodate the data needs of the CHP, such as automatic information transfers between TEB and the CHP bus and modified limousine inspection programs, a task now accomplished via a dedicated fax machine. A modern database would respond to CHP queries to verify a carrier’s real-time operational status more quickly and efficiently than the current system. Similarly, TEB could more easily access DMV records regarding driver, vehicle and insurance status. And finally, TEB could respond to specific information requests from the CHP, the DMV, and other state agencies, as well as from district attorneys, state decision makers, and the public.

¹ By May 1, 2015, all TEB investigators completed two mandatory courses offered by the enforcement program at El Rio Community College: Peace Officer Training (known as PCA 832) and Investigative Techniques.

2. CPUC Strategic Options for Transportation Program

Problem Statement

The problem is, “what is the most cost-effective way to provide consumer protection and other value to Californians using transportation services regulated by the state?”

On this question, our current experience provides little insight. TEB’s consistent underperformance is likely the result of years of low prioritization by a Commission tasked with a broad range of responsibilities, including regulation of privately owned electric, natural gas, telecommunications, water, railroad, rail transit, and passenger and household goods carriers. Thus, it is not possible to readily predict how a regulated program, supported by the Commission, would compare with a program supported in another agency.

Is the Commission the best home for regulation of passenger carriers and movers? Or would another agency whose sole focus is to enforce the California Vehicle Code, such as the DMV or the CHP, be better equipped than the CPUC to operate a transportation permit, enforcement, investigatory and adjudicatory program effectively and efficiently?

Moving the transportation program to another agency could have the dual benefit of improving state oversight of carriers while enabling the Commission to better focus on its energy mandates. There are important tradeoffs to consider, including the costs associated with transferring responsibilities between agencies, gaining expertise and the impact on existing staff, and the feasibility of legislative action. This brief considers the pros and cons of two options:

Option 1: Shifting responsibility for regulation of passenger and household goods carriers to another agency, and

Option 2: Improving regulation of passenger and household goods carriers at the CPUC.

The latter part of the brief estimates the resources required to enable the Commission to successfully address challenges in its transportation program, considers staff concerns, and suggests next steps in the Commission’s deliberative process.

Option 1: Shift responsibility for regulation of passenger carriers and movers, in whole or in part, to another agency.

Moving regulatory responsibilities from the CPUC to another agency would require legislative and gubernatorial action. While the regulation of passenger carriers and movers does not appear to fit perfectly into the current regulatory regimes of any existing state agencies, efficiencies may be found at the DMV, the CHP or perhaps the Department of Consumer Affairs (DCA).

The Commission could also recommend that state decision-makers allocate various aspects of transportation regulation currently within the CPUC among multiple agencies – e.g. permitting, insurance and workers’ compensation verification functions go to the DMV; citation and investigatory functions to the CHP and local law enforcement; and adjudicatory functions to state and local prosecutors and court systems.

Another hypothetical solution is to recommend creation of an entirely new department/organization under the California State Transportation Agency (CalSTA). CalSTA is an 'umbrella' organization that was formed on Jan 1, 2013, to house CHP, DMV, CalTrans and other transportation-related entities. Creation of this entirely new entity under CalSTA has not been formally proposed by anyone, but logically this could be a solution if none of the existing organizations are a good fit for the program.

Pros

- *The Commission could better focus on its other mandates.*

Regulation of passenger carriers and movers has a modest relationship to the other functions the CPUC performs. Without it, the CPUC could more effectively focus its resources on regulation of energy, water, telecommunications, and rail safety. The CPUC is currently under enormous pressure from legislators, the media, and the public to improve its safety programs in all jurisdictional industries. A Commission recommendation to transfer its transportation oversight responsibilities to other state and local agencies could, for example, signal to the energy utilities and external stakeholders that the Commission is committed to pursuing lasting solutions to the natural gas safety program challenges identified in the post-San Bruno recommendations from the National Transportation and Safety Board (NTSB) and Independent Review Panel, and the Crowe Horwath audit. A Commission with a narrower focus could target internal improvements to better ensure energy utility compliance with safety regulations, such as improved staff tools, training and procedures; enhanced resources and technology capabilities; and focused strategic planning.

- *Other agencies could potentially provide more effective and efficient regulation of passenger and household goods carriers.*

Organizations like the DMV and the CHP may be better equipped than the Commission to issue permits and citations to carriers, as they already have the systems and staff in place to administer driver and vehicle licensing programs, conduct bus inspections, investigate accidents and issue citations on public highways.

- *Other agencies or a new organization under CalSTA could have an easier time obtaining new resources for the transportation program*

In recent years, the CPUC has had a challenging time obtaining additional resources for a variety of reasons. Transition of this program outside of the CPUC may enable the new "owner" of the program to perform a fresh analysis of needs and more effectively meet those needs, especially if there is a better strategic alliance with that program's main responsibilities.

- *Creating a new Transportation Safety Agency could help tackle a changing industry.*

In recent years, the CPUC's decision to regulate Transportation Network Companies (TNC) like Uber and Lyft has introduced significant new challenges into the passenger carrier marketplace. In 2013, the CPUC established basic operational terms and conditions, followed by comprehensive insurance requirements in 2014. In 2015, the

CPUC will consider additional safety and consumer protection requirements for TNCs and other passenger carriers.

The taxi industry, currently regulated at the local level, may seek legislation to fall under state jurisdiction, along with privately owned TNCs, limousines, buses and other passenger carriers, currently housed at the Commission. Alternatively, the state could consider forming a new regulatory agency to focus solely on transportation policy, permitting, citations, prosecution and adjudication, with expanded jurisdiction over entities currently regulated locally. However, this is highly speculative at this point and no formal assessment has been done on the feasibility of this solution.

Cons

- *There is no clear agency that can or wants to take over current CPUC transportation program.*

Regulation of passenger carriers and movers does not appear to mesh neatly with existing agencies' regulatory functions or mandates. Other agencies may not readily accept a transfer of responsibilities, which would pose a challenge for the Commission. Any CPUC recommendation to transfer such functions presupposes that the receiving agency is both willing and prepared to take on the new responsibilities..

- *Creating a new transportation agency or transferring responsibility to a different agency would require legislation.*

Creating a new transportation agency or moving regulation of passenger carriers and movers to another agency would involve a political struggle. It would require legislative action and soliciting support could be difficult. Attempting to transfer regulatory responsibility to a hostile agency, or in conflict with carrier preferences, would exacerbate the situation.

- *To replicate the Commission's program, a new agency would need to develop unfamiliar functions and expertise.*

The CPUC is unique among the agencies under consideration to house carrier regulation in that it has in-house policy, litigation, investigative, and adjudicatory functions regarding passenger and household goods carriers. In the absence of an agency adjudicatory process, local district attorneys and the state Attorney General would bear sole responsibility for prioritizing and prosecuting transportation enforcement cases.

- *Transaction costs associated with transferring regulatory responsibility are significant.*

Moving regulation of passenger carriers and movers to another agency would result in significant transaction costs: finding new office space, recruiting personnel, migrating IT systems and records, publicizing the change, etc. It is unclear to what extent these costs would be offset by new efficiencies found in a different agency. The amount of work that needs to be done is the same, regardless of which agency performs it. Since there is no clear agency that can take over the current role of the CPUC, it is likely that any efficiencies from moving the transportation program would be minimal. If few new efficiencies would be achieved, the transaction costs associated with the move may outweigh the benefits. Additional analysis is needed to gauge the order of magnitude of the various costs and benefits.

- *Transfer of regulatory responsibilities will take at least 5 years.*

If the Commission pursues moving regulatory responsibilities to a different agency, the transition is likely to take, at a minimum, five years. Even if a bill were introduced and enacted in the next legislative cycle, the Governor would not sign it into law until the third quarter of 2016. Logistical planning for the transfer would likely take a full two years - the first positions at the new agency could not be posted before late 2018. The new branch would require a year or two to grow its operational capacity to the point where TEB could transfer all its remaining functions, meaning that new branch or agency would not be fully functional before 2020. In the meantime, the Commission would still need to determine how to move ahead with the various program improvements called for in the BSA audit, as it would retain at least some responsibility for carrier regulation through 2020 or beyond.

Option 2: Invest in regulation of passenger and household goods carriers at the Commission

If TEB's regulatory responsibilities were to remain with the Commission, the Executive Director, ALJ and SED management, and Commissioners would need to address the Branch's continuing challenges: increased workload, personnel classification structure that makes it difficult to attract qualified individuals, new enforcement challenges, and inadequate IT systems.² Although passenger carrier revenue (fees and penalties) is ample to address the items identified in the audit, the Commission's authorized annual budget does not allow it to spend all available transportation funding. To implement the California State Auditor's recommendations, and to improve its performance to ensure public safety, TEB will require significant additional investment and attention moving forward, as well as support from legislative oversight committees.

Pros

- *The advantages of keeping regulation of passenger carriers and movers at the CPUC are the inverse of the disadvantages of trying to move it. The state would avoid costs associated with transfer of regulatory responsibilities.*

As noted above, there are considerable costs associated with transferring regulatory responsibilities from one agency to another: transaction costs, the time required to complete the transition, the costs associated with passing the necessary legislation, etc. No transfer of responsibilities would mean no transaction costs.

- *The Commission is unique in having its own adjudicatory venue for formal proceedings.*

The Commission provides its own venue to adjudicate formal transportation proceedings, including those to prosecute cases. The Administrative Law Judges at the Commission preside over formal enforcement and investigation proceedings for all regulated industries, including transportation. An agency like the DMV or CHP would be unable to perform these functions. Currently, the DMV allows a cited driver to participate in traffic school to remove certain minor violations from his/her driving record, while CHP and local law officers act as

² The shortage of IT resources is, however, not unique to TEB, and the Commission will attempt to address this wider problem this year⁴.

witnesses to formal Commission proceedings, before a traffic court, or in response to civil or criminal cases brought forth by a local district attorney.

- *TEB prepared a roadmap towards improving the transportation program. The problems are known and fixable.*

In April 2015, TEB completed an annual plan which outlines priorities and modernization strategies going forward, such as:

- Improved customer service for carriers and consumers.
- Increased outreach and training to local airports, law enforcement and prosecutors.
- Financial audits.
- Acquiring an "off the shelf" product to accept online applications and fee payments until the permanent system is developed by 2017.
- Enhanced data collection and analysis capabilities for legacy IT systems.
- Smarter enforcement, such as increasing the number of sting operations at major events such as graduations and music festivals.

Given time and sufficient resources, SED management is confident that TEB can meet its performance expectations.

Cons

- *The Commission continues to be limited in its ability to effectively prioritize between regulatory responsibilities.*

If regulation of passenger carriers and movers remains at the Commission, the agency will continue to be hampered by a disparate set of regulatory responsibilities, which could limit its ability to focus resources on higher priority missions, such as oil-by-rail, electric, and natural gas safety. If the Commission fails to provide additional attention and resources to TEB, the program will continue to underperform, leaving the Commission vulnerable to future negative audits and criticism from external stakeholders.

- *TEB suffers from chronic understaffing and position classification structure that will need to be addressed.*

If TEB's regulatory responsibilities remain with the CPUC, then Executive and SED management and Commissioners would need to address the Branch's continuing staffing challenges. Within the last decade, the majority of non-management positions in the Analysis Section were downgraded from Public Utility Regulatory Analysts (PURAs) and Transportation Analysts (TAs) to support staff classifications. Service quality and efficiency declined commensurate to the lost analytical skills. Similarly, while the number of carriers and complaints increased significantly over the last decade, the Commission did not increase the investigative, litigation, audit, outreach, Legal, and Fiscal Office staff to meet field work, formal enforcement, revenue verification and collection, and stakeholder education/training needs. The end results are the deficiencies detailed in the BSA audit.

- *TEB's information technologies require significant upgrading.*

The Branch operates on three legacy IT systems to track complaints, investigations, and carrier permit information. The three systems are unable to "talk" to each other, and offer limited analytical capabilities. TEB staff and IT are designing a new system with an

estimated completion date of 2017. Meantime, the team is exploring the feasibility of installing an “off the shelf” product by the end of 2015 as a temporary solution.

3. Resource Estimates for TEB Program Improvement

The Transportation Enforcement Branch currently employs 47 permanent staff, comprised of:

- One program manager, three program supervisors, and six front line supervisors.
- 22 inspector-investigators.
- Three permitting analysts
- Eight support staff.
- Two policy analysts.
- Two consumer affairs representatives.
- In 2014, TEB also augmented staff resources with six limited-term, rotational and retired annuitant staff.

In 2014, the Commission also allocated the equivalent of one attorney and .75 legal support staff to TEB advisory and prosecution activities. Similarly, the equivalent of 0.3 PY administrative law judges adjudicate formal transportation proceedings.

Resource Estimates to Achieve Baseline Improvements

For baseline improvements to implement auditor’s recommendations and foundational issued identified by SED management, TEB requires one Financial Auditor to develop a field audit and collection program; one PURA V to provide policy, data analysis and advocacy support for the Enforcement team, and one PURA IV to prepare Resolutions and Examiner Decisions. The net increase would be 3 full-time positions.

Resource Estimates to Achieve Maximum Improvements

To achieve optimal results, TEB requires increased enforcement, analysis, legal, judicial, and client service/training resources. An effective and efficient program would allow TEB to reallocate equivalent resources among programs, which is not currently possible with disparate classifications. This would mean a net increase of 32 full-time positions, as follows:

- **Airport enforcement.** Currently, only the Los Angeles International Airport (LAX) supports a full-time TEB enforcement program. In 2014 alone, TEB staff brokered 400 civil compromise cases at LAX. The San Francisco Airport (SFO), Oakland Airport (OAK), and San Diego Airport welcome an increased presence, but lack office space for onsite inspectors. To achieve results similar to those at LAX, TEB would add an Airport Section to the Northern and Southern California enforcement units, respectively. Each unit would consist of one supervisor and three inspectors. **Net increase: 8 positions.**
- **Passenger and household goods enforcement.** Most investigators welcome both types of cases, which facilitates dual expertise and optimizes staffing flexibility. Ideally, TEB would add twelve investigators and two first-line supervisors, allocated between the Northern and Southern California Enforcement teams, which would increase TEB’s ability to conduct more proactive enforcement activities, as opposed to opening investigations as a result of a consumer or carrier complaint; conduct stings and joint

enforcement efforts; and monitor and enforce against increased illegal carrier activity on the Internet, such as company websites, Craigslist, Facebook and Yelp. **Net increase: 14 positions.**

- **Consumer and Carrier Services.** Call data supports six additional Consumer Affairs Representatives (CARs) to handle consumer and carrier calls and emails. Five Transportation Analysts would analyze new carrier applications and take over the most complex calls and emails regarding licensing and technical issues. **Net increase: 10 positions.**
- **Outreach and Education.** TEB believes the net staff increase will accommodate education and outreach opportunities to industry and law enforcement entities, and free up time for an existing analyst to develop outreach materials in coordination with the Commission's Business and Community Outreach staff and conduct quarterly application preparation workshops around the state. **Net increase: None.**

Legal. Finally, increased field citations and associated fines will lead to additional citation appeals, which could require additional attorneys, administrative law judges, and associated support staff.

Note: significant investments in IT are also needed, which are outlined in more detail in the SED IT Enforcement Needs Assessment memo.

4. Staff Concerns

CPUC transportation staff experiences chronic anxiety regarding the lack of resources available to them to perform their jobs, enforce safety laws, and meet the expectations of state auditors and legislators. Recent media interviews quote Commission leadership statements that agencies located elsewhere in the state could better perform the transportation regulatory function exacerbates staff anxiety, which now includes worries about employment security, and the ability to pay mortgages and other family expenses.

The majority of CPUC transportation staff, major airports and regulated carriers are based in San Francisco, Los Angeles, and San Diego. All other transportation agencies are headquartered in Sacramento. If the transportation program relocated to a different agency, it is not likely that CPUC staff would uproot their lives to follow the program. The CPUC employs highly-qualified and high-performing transportation and legal staff representing years of training and experience. Californians would lose the benefit of that training and experience if the program moved elsewhere, which means the state would need to hire and train new staff at a new or existing transportation agency. The CPUC would also have to determine whether and how to reclassify and place the remaining TEB personnel. While some could be reabsorbed into other branches and divisions, it's unlikely the Commission would be able to accommodate all TEB employees.

5. Next Steps

- SED schedules one-on-one briefings with each Commissioner's office [May/June]
- Discussion in Leg Sub meeting [June]

- Issue is taken up in Policy and Governance Subcommittee [June 24]
- Executive Director to provide direction to Deputy Executive Director and SED management on what level of resources to ask for in BCPs [mid-July]